

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ZENIMAX MEDIA INC. and
ID SOFTWARE LLC,

Plaintiffs,

V.

OCULUS VR, LLC,
PALMER LUCKEY,
and FACEBOOK, INC.

Defendants.

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CIVIL CASE NO. 3:14-cv-01849-P

AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to the Court’s February 3, 2015 Order (Dkt. No. 105), Plaintiffs ZeniMax Media Inc. and id Software LLC (collectively, “ZeniMax”) and Defendants Oculus VR, LLC, Palmer Luckey, and Facebook, Inc. (collectively, “Defendants”) hereby move the Court to enter the Proposed Protective Order attached to this Motion as Exhibit 1.

On September 12, 2014, ZeniMax filed a Motion for Entry of an Order for the Protection of Confidential Information. (Dkt. No. 42.) On October 3, 2014, Defendants filed a Partial Opposition to Plaintiffs' Motion for Entry of an Order for the Protection of Confidential Information and Cross-Motion for Entry of Defendants' Proposed Order for the Protection of Confidential Information. (Dkt. No. 62.) The Court denied both of those motions without prejudice on January 26, 2015 (Dkt. No. 103) and ordered the parties to submit a mutually agreeable draft protective order by February 5, 2015 (Dkt. No. 105).

Accordingly, the parties request that the Court enter the Proposed Protective Order attached hereto as Exhibit 1.

Dated: February 5, 2015

Respectfully submitted,

/s/ Phillip B. Philbin

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Attorneys for Defendants

Oculus VR, LLC (successor by merger to

Oculus VR, Inc.), Facebook Inc., and Palmer

Luckey

CERTIFICATE OF SERVICE

On February 5, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

Dated: February 5, 2015

/s/ Phillip B. Philbin

Phillip B. Philbin